

BORRELLI & ASSOCIATES

— P.L.L.C. —

www.employmentlawyernewyork.com

655 Third Avenue
Suite 1821
New York, NY 10017
Tel. No. 212.679.5000
Fax No. 212.679.5005

910 Franklin Avenue
Suite 200
Garden City, NY 11530
Tel. No. 516.248.5550
Fax No. 516.248.6027

December 7, 2022

Via ECF

The Honorable Sarah L. Cave
United States Magistrate Judge for the
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Eunice Raquel Flores Thomas et. al. v. AAM Holding Corp. et. al.*
Docket No.: 22-cv-03110 (GHW)(SLC)


Dear Judge Cave:

We represent the named-Plaintiff, Eunice Raquel Flores Thomas, and the opt-in Plaintiff, Keiko Tanaka, in the above-referenced collective action alleging wage violations under the Fair Labor Standards Act and the New York Labor Law against Defendants AAM Holding Corp. d/b/a Flashdancers Gentlemen's Club, 59 Murrey Street Enterprises, Inc. d/b/a Flashdancers Gentlemen's Club, Barry Lipsitz, individually, and Barry Lipsitz, Jr., individually. We write now, pursuant to this Court's Order on November 9, 2022, ECF 29, which instructed the parties to submit a joint status letter regarding the status of their arbitrations, including the date or projected date for the hearings.

Since the Court's Order, with respect to Thomas's claims, the parties have selected an arbitrator, David Singer, received a discovery schedule, and scheduled hearing dates for April 11 to April 13, 2023. With respect to Tanaka's claims, the parties received a discovery schedule from Arbitrator Ronald Kreismann and scheduled hearing dates for March 21 to March 23, 2023.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in cursive script, reading "Danielle Petretta", is positioned above a horizontal line.

Danielle Petretta, Esq.

For the Firm

To: All counsel *via* ECF